UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

MICHAEL P. AND SHELLIE GILMOR,)
Plaintiffs,)
v.) Case No. 04:10-CV-00189-ODS
PREFERRED CREDIT CORPORATION, et al.,)))
Defendants.)

UNOPPOSED MOTION OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION AS FORMER TRUSTEE, FOR LEAVE TO FILE SUGGESTIONS IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT IN EXCESS OF PAGE LIMITATION

Defendant JPMorgan Chase Bank, National Association ("JPMC"), as former trustee, respectfully move this Court for leave to file its Suggestions in Support of its Motion for Summary Judgment in excess of the page limit set forth in Local Rule 7.0(f). In support of this request, which is unopposed, JPMC states as follows:

- 1. Local Rule 7.0(f) permits a party to file suggestions in support to motions in excess of fifteen (15) pages with "permission of the Court." Pursuant to that Rule, JPMC seeks leave to file its Suggestions in Support of its Motion for Summary Judgment ("Motion") in excess of the fifteen (15) page limit contained in Local Rule 7.0(f).
- 2. JPMC submits that good cause exists for this request. This case is complex, 12 years old and substantial discovery has occurred since this case was filed. JPMC possesses numerous grounds for seeking summary judgment.
- 3. JPMC accordingly requests leave to file a Suggestion in Support of its Motion for Summary Judgment that does not exceed thirty (30) pages in length. JPMC is still in the process

of preparing their Suggestions, and its brief may be shorter than the thirty (30) pages which they have requested.

- 4. This motion is not made for the purpose of delay or harassment, and no party will be prejudiced if the motion is granted.
 - 5. JPMC has contacted counsel for Plaintiffs, who do not oppose the requested relief.

WHEREFORE, JPMC respectfully requests the Court grant them leave to file its Suggestions in Support of its Motion for Summary Judgment of up to thirty (30) pages in length.

Respectfully submitted,

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ATTORNEYS JPMORGAN CHASE BANK, NATIONAL ASSOCIATION, AS FORMER TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was filed electronically with the above-captioned court, with notice of case activity to be generated and sent electronically by the Clerk of said court (with a copy to be mailed to any individuals who do not receive electronic notice from the Clerk) this 23rd day of August 2012, to all counsel of record.

/s/ Mark A. Olthoff

Attorney for JPMorgan Chase Bank, National Association, as former Trustee